

EXHIBIT 2



WILLIAMS, PORTER, DAY & NEVILLE P.C.
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February 21, 2024

VIA E-MAIL ONLY

Khale J. Lenhart
HIRST APPLGATE, LLP
P.O. Box 1083
Cheyenne, WY 82003

Re: Bitmain Georgia's February 20, 2024 Meritless Objections And So
Little Production to BCB's First Set of Requests for Production of
Documents

Dear Khale:

I am writing to express my deep concern with the gross inadequacy of Bitmain Georgia's February 20, 2024 *Responses* [really, Objections] to *Plaintiff's First Set of Requests for Production*.

Bitmain Georgia objected to all 28 of Plaintiff BCB's requests for production. Bitmain Georgia produced only 98 total pages with its 2/20/24 production of documents, and 37 of those 98 pages were the same *SF Agreement* that Bitmain Georgia produced last week. None of the "new" 61 pages were meaningful, Khale. And the only excel spreadsheet Bitmain produced is in Chinese. All Bitmain Georgia produced were documents the MOTBO Defendants sent to Bitmain. No e-mails. No WeChat messages. No finance documents. And no e-mail or WeChat message that was sent or received with any of the few documents Bitmain produced. Nowhere in Bitmain Georgia's 2/20/24 production was a single Bitmain Georgia employee or representative identified as sending or receiving communications with MineOne.

Here are BCB's global concerns with Bitmain Georgia's grossly deficient production and multiple objections, Khale. Mind you, this letter globally describes BCB's greatest concerns, but not all of its concerns.

A. Where is Bitmain Georgia's Privilege Log?

Of the 28 requests for production to Bitmain Georgia, your client asserted attorney client and work product privileges to 24 of those requests. But Bitmain Georgia provided no Privilege Log with its 2/20/24 production and objections. *See* USDCLR 34.1(c) and 37.1(a). Our federal district court has stringently required Privilege Logs where, as here, a party objects to producing arguably privileged materials. Our Wyoming federal court requires a Privilege Log for asserted privilege objections. Why didn't Bitmain Georgia provide a Privilege Log with its deficient document production and objections, Khale?

B. With the Exception of the Final *SF Agreement*, Bitmain Georgia Did Not Provide a Single Meaningful Document. Instead, Bitmain Georgia Asserted Meritless Objections.

Bitmain Georgia asserted meritless objections to nearly all of the relevant requests for production. For example, Bitmain Georgia objected to producing *any* document or communication to the following Requests for Production:

- (1) All documents and communications between and among MOTBO Defendants and Bitmain. (RFP No. 1).
- (2) Any and all drafts (*i.e.*, incomplete and/or unsigned versions of the *Service Framework Agreement*). (RFP No. 2).
- (3) All communications between MOTBO Defendants and Bitmain concerning the *Service Framework Agreement*. (RFP No. 4).
- (4) In addition to the *Service Framework Agreement*, any and all contracts and agreements between you and MOTBO Defendants. (RFP No. 5).
- (5) In addition to the *Service Framework Agreement*, all documents and communications concerning any and all agreements or contracts between Bitmain and MOTBO Defendants. (RFP No. 6).



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- (6) All documents and communications concerning payments made to any of the MOTBO Defendants (*i.e.*, under the *Service Framework Agreement* and any other agreement you have with any of the MOTBO Defendants). (RFP No. 7).
- (7) All documents and communications concerning North Range. (RFP No. 9).
- (8) All documents and communications concerning Campstool. (RFP No. 10).

We understand Bitmain Georgia is planning and contracting to provide all of its miners and/or mining operating services at Campstool. BCB needs all of this information to provide to its damages expert, the expert whose report is due in exactly one week. If, indeed, Bitmain Georgia and MineOne are planning to have Bitmain Georgia's miners at Campstool, there are surely important documents – such as a separate draft *SF Agreement*, correspondence, and draft financing agreement(s) – circulating between Bitmain Georgia and MineOne *for Campstool*. But your client produced none of these important Campstool documents.

- (9) All documents and communications concerning Bitmain's 9,800 S19XP Bitcoin mining machines that arrived in Cheyenne in February 2023. (RFP No. 11).
- (10) All documents and communications concerning any and all Bitcoin mining machines (owned and/or sold by Bitmain) that have arrived in Cheyenne since March 1, 2023. (RFP No. 12).
- (11) All documents and communications – including, but not limited to, all contracts and agreements – concerning the O&M Service Provider (identified and defined in the *Service Framework Agreement*) at North Range (Note: the *Service Framework Agreement* reads, "If there is no other specific agreement, BTMAIN or the third party designated by BITMAIN (collectively, the "O&M Service Provider") shall be responsible for the operation and maintenance of the Hosted Servers..."). (RFP No. 15).
- (12) All documents and communications concerning any and all loan and/or financing agreements or contracts between any of the MOTBO Defendants and Bitmain (Note: please refer to MINEONE0010529 (*see* "Exhibit A"



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attached) where a potential multi-million dollar loan is identified from Bitmain to one, some, or all of the MOTBO Defendants).

Again, Bitmain Georgia provided no documents or communications of any loan and/or financing agreements between any of the MOTBO Defendants and Bitmain, despite the existence of such agreements, as established by Jiaming Lee's December 15, 2023 e-mail, a copy of which is attached as "**Exhibit A**" to this letter.

- (13) All bank statements and/or crypto currency transaction records showing all transfers of funds, cryptocurrency, and/or assets from Bitmain to any of the MOTBO Defendants concerning loan and/or financing agreements between any of the MOTBO Defendants and Bitmain. (RFP No. 17).

Again, Bitmain Georgia objected to all of this, producing nothing to BCB.

- (14) All documents and communications concerning "the deal" between any of the MOTBO Defendants and Bitmain referenced in MINEONE0001852 (*see* "**Exhibit B**" attached) (*i.e.*, "We did receive your text stating you are unable to pay further as its directly affecting you personally, until your deal with Bitmain Closes your deal, of which is understandable, System's is now and has been on board with assisting your companies, in finishing the work needed to be done."). (RFP No. 18).

Again, Bitmain Georgia objected to all of this, producing nothing to BCB.

- (15) All documents and communications between Bitmain and CryptoKnight concerning the personal introduction that was made by Bitmain that introduced one, some or all of the MOTBO Defendants (*e.g.*, Huaili Zhang) to CryptoKnight. (RFP No. 19).
- (16) All documents and communications since December 1, 2022 between Bitmain and CryptoKnight concerning CryptoKnight traveling to Georgia and being trained in Georgia. (RFP No. 20).
- (17) All documents and communications since December 1, 2022 between Bitmain and CryptoKnight concerning any and all participation, business interests, sales, or business relationship that Bitmain has with or in CryptoKnight. (RFP No. 21).



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- (18) All documents and communications from December 1, 2022 to July 1, 2023 between Bitmain and CryptoKnight's Client(s). (RFP No. 22).
- (19) All documents and communications concerning hosting, operations, and site management at North Range. (RFP No. 23).

Again, Bitmain Georgia objected to all of this, producing nothing to BCB.

- (20) All documents and communications by, to, or from Yiliang Guo concerning North Range, Campstool, and/or BCB. (RFP No. 24).
- (21) All documents and communications by, to, or from Ran Chang concerning North Range, Campstool, and/or BCB. (RFP No. 25).
- (22) Your (publicly accessible) bitcoin wallet address(es) concerning yours and/or Bitmain's bitcoin mining rewards at North Range. (RFP No. 26).

Khale, I favored you with my three (3) meet and confer letters to MineOne's counsel on January 18, January 24, and January 29, 2024 with all my concerns with the MOTBO Defendants' inadequate discovery responses to BCB's requests for production of documents to MineOne, Terra Crypto and SonicHash. All of my arguments in those conferral letters are incorporated here by reference (but not re-stated). Those conferral letters demonstrate why the requests recited above are relevant to BCB's claim for intentional interference with contract against Bitmain Georgia, and to BCB's claims against the MOTBO Defendants. That Bitmain Georgia would refuse to produce any documents to the above-stated RFP's – except the final *SF Agreement* – is unfathomable. Charitably, Bitmain Georgia is dodging its discovery obligations to BCB.

Two other BCB requests deserve mention here: they are BCB RFP Nos. 27 and 28. RFP No. 27 asks Bitmain Georgia to produce "all documents and communications concerning BCB by and/or between representatives of Bitmain." And RFP No. 28 asks Bitmain Georgia to produce "all documents and communications concerning BCB between you [Bitmain] and any of the MOTBO Defendants." Bitmain set forth its standard meritless objections to these two relevant requests, but then Bitmain responded as follows to RFP No. 27 and 28:



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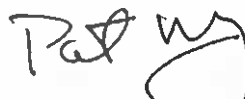
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Subject to and without waiving the foregoing general and specific objections, Bitmain Georgia responds as follows: Bitmain Georgia will conduct a reasonably diligent search of those files in its possession, custody, or control believed likely to contain responsive documents and will produce all responsive, non-privileged documents, if any, that discuss, mention, or refer to BCB from February 2022 through the date Plaintiff filed suit in the Wyoming Chancery Court, that it is able to locate.

Bitmain Georgia recognizes the relevancy of these requests, and I would have expected Bitmain Georgia to have *produced* these requested documents with its February 20, 2024 responses and objections. But nothing was produced. And you did not indicate 'when' these documents would be produced. And, before you sent me Bitmain's February 20, 2024 objections and responses, you never called, wrote or communicated with me as to "when" Bitmain will produce these highly relevant documents and communications. Had you done that, I would have been inclined to grant Bitmain Georgia a short extension of time to actually produce these documents. Absent such a call or a 'heads up' request, what am I to think about Bitmain Georgia's refusal to provide *any* of these documents and communications with its 2/20/24 discovery responses?

I will call you this afternoon to arrange for a meet-and-confer conference with you sometime tomorrow, Khale. [I am suffering acute kidney stone pain right, and hopefully the offending stone will pass naturally without surgery – but I've had four prior kidney stone surgeries in 2011, 2017, 2023, and 2023. So, who knows?!]. Presently, I am available to confer anytime on Thursday, February 22, 2024 (except from 1:30-3:30 for an out of office appointment). I don't anticipate a long conferral call with you. I expect Bitmain Georgia to continue stonewalling BCB's effort to obtain *meaningful* discovery documents from Bitmain Georgia. But I will ask that Bitmain now agree to provide all of the requested documents requested above.

Very truly yours,



Patrick J. Murphy

Exhibit A

Message

From: Jiaming Li [jiam@ucholding.com]
on behalf of Jiaming Li <jiam@ucholding.com> [jiam@ucholding.com]
Sent: 12/15/2022 3:52:56 PM
To: Erick Rengifo [rengifo@ucholding.com]
CC: haku du [info@mineonepartners.com]
Subject: Current funding situation

Hi Erick,

As the construction continues under progress, we're happy to get another investor who has already signed a commitment of \$2,000,000 investment to our site as a senior investor.

Also, we're under discussion with the largest manufacturer, Bitmain, for a comprehensive partnership: a) we're going to host their miners around 9,000 to fit 6MDCs, and they're going to ship the most advanced series S19 XP. b) Bitmain will loan us 50% LTV of what we have spent on the time our site energized, which means, around \$8,000,000 will fund us to allow us to continue phase 2, or buy additional miners, or lower down our debt rate, etc.

But Bitmain requires us to energize asap, also from our best interest, we can only sign agreements and get their funds by then. Which means, we need current lender's money to speed up the process, even 1 day means a lot to us. As soon as the new investor's \$2M arrives, it'll immediately transfer back to them, which should be happening by this Friday or Monday maximum since it's an international transfer, normally taking 2-5 days.

Please let me know your thoughts.

Best,
Jiaming